

**Duke Energy Progress' Response to  
Vote Solar's First Set of Written Discovery Request  
Pursuant to S.C. Code Ann. § 58-4-55  
Docket No. 2018-318-E  
Related to Customer Accounts  
Date of Request: January 22, 2019  
Date of Response: February 1, 2019**

☐ CONFIDENTIAL

☒ NOT CONFIDENTIAL

The attached response to First Data Request #1-57, was provided to me by the following individual: Elaine A. McCallister, Manager, Nonresidential & Sourced AR Operations, and was provided to Vote Solar under my supervision.

Heather Shirley Smith  
Deputy General Counsel  
Duke Energy Progress, LLC

**DUKE ENERGY PROGRESS**

**Request:**

- 1-57 Please provide all studies, analyses, memos, workpapers, or written documents of any nature that disaggregate the source of Bad Debt to the Company by the following:
- (a) Customer class;
  - (b) Geography (e.g., zip code, census block, etc.) (for residential Bad Debt);
  - (c) Socio-economic status of the customer (for residential Bad Debt).

**Response:**

No studies, analyses, or memos of the nature requested currently exist. Further, DEP does not obtain or maintain customer data based on zip code or socio-economic status in its billing system. Net charge offs are tracked by customer class.

**Duke Energy Progress' Response to  
Vote Solar's First Set of Written Discovery Request  
Pursuant to S.C. Code Ann. § 58-4-55  
Docket No. 2018-318-E  
Related to Customer Accounts  
Date of Request: January 22, 2019  
Date of Response: February 1, 2019**

☐ **CONFIDENTIAL**

☒ **NOT CONFIDENTIAL**

The attached response to First Data Request #1-58, was provided to me by the following individual: Elaine A. McCallister, Manager, Nonresidential & Sourced AR Operations, and was provided to Vote Solar under my supervision.

Heather Shirley Smith  
Deputy General Counsel  
Duke Energy Progress, LLC

**DUKE ENERGY PROGRESS**

**Request:**

- 1-58 Please provide all studies, analyses, memos, workpapers, or written documents of any nature that disaggregate the source of arrears to the Company by the following:
- (a) Customer class;
  - (b) Geography (e.g., zip code, census block, etc.) (for residential arrears);
  - (c) Socio-economic status of the customer (for residential arrears).

**Response:**

No studies, analyses, or memos of the nature requested currently exist. Further, DEP does not obtain or maintain customer data based on zip code or socio-economic status in its billing system. Net charge offs are tracked by customer class.

**Duke Energy Progress' Response to  
SC NAACP, Coastal Conservation League, Upstate Forever's Third Data Request  
Pursuant to S.C. Code Ann. § 58-4-55**

**Date of Request: March 21, 2019**

**Date of Response: March 25, 2019**

☐ **CONFIDENTIAL**

☒ **NOT CONFIDENTIAL**

The attached response to the Third Data Request 3-1, was provided to me by the following individual: Stephen B. Wheeler, Rates and Regulatory Strategy Director, and was provided to the South Carolina NAACP, South Carolina Coastal Conservation League, and Upstate Forever under my supervision.

Heather Shirley Smith  
Deputy General Counsel  
Duke Energy Progress, LLC

**DUKE ENERGY PROGRESS**

**Request:**

3-1 Please refer to the Rebuttal Testimony of Steven Wheeler, p. 7, and the bar graph entitled “# of DEP Low Income Bills by Usage Level (Household Income < \$30,000).”

(a) Please cite and provide access to all sources of data or other information the Company relied upon to develop the graph.

(b) Please provide in executable Excel spreadsheet format all worksheets used to generate the graph.

(c) With regard to the Company’s responses to Vote Solar Data Requests 1-49, 1-57, and 1-58, please explain how the Company was able to produce the graph when it otherwise indicated to intervenors that the Company does not track usage or billing information for low-income customers and does not obtain or maintain customer data based on zip code or socio-economic status.

(d) Please indicate whether the graph includes usage levels for all residential DEC customers in South Carolina with a household income of less than \$30,000.

(e) If the answer to 2-1(d) is no, that the graph is not inclusive of all households with incomes of less than \$30,000, please indicate how this sample of households was selected, where those households are located, and what criteria were used to select these households for inclusion in this graph. If the answer is no, because the underlying source of the data on household incomes is not complete, please indicate approximately how many residential accounts are omitted from that database.

(f) Please indicate whether the Company has information about the number of individuals per household for those households included in the graph and if so, please provide that information.

(g) Can the Company run similar analyses for customers who earn more than \$30,000 per year? If so, can you provide such analyses for customers in income brackets above \$30,000 per year for the same time period covered in the chart on Mr. Wheeler’s rebuttal testimony?

**Response:**

(a) The Company used a proprietary database from Acxiom Corporation to obtain information on income levels.

(b) Please see the attached file 'SCNAACP DR 3-1b Low Income Usage - South Carolina.xlsx'. This file shows the results of the query that was run against the database that returns the income level, customer usage data, and the number of months of service. The average monthly usage per

customer was calculated for use in developing the graph. Customer Account number and other identifying information has been removed.



SCNAACP DR 3-1b  
Low Income Usage -

(c) Vote Solar 1-49, 1-57 and 1-58 requests were interpreted as seeking information on arrearages which is not tracked on an income level in the Company's billing system where arrearage information is maintained. The Company did provide a limited amount of usage information that was cross referenced with income information available in an external data base in response to ORS Rates Request 10-2 which was provided to South Carolina NAACP, Coastal Conservation League, Upstate Forever in response to DEP CCL NCAAP Upstate Forever Data Request 1-1.

(d) The Acxiom data base considered all DEP South Carolina residential accounts that fell within one of two income ranges that might be considered to fall within a low-income range. The ranges were combined for purposes of creating the graph.

(e) n/a

(f) This information wasn't included in the Acxiom data used to create the usage query.

(g) Individual usage by income data is not readily available and would require a study to obtain the requested information. As a timely substitute, the Company has provided annual mean monthly usage by SC residential customer by income level. This information is provided in the Excel file titled 'SCNAACP DR 3-1b Low Income Usage - South Carolina.xlsx' provided in the response to Part (b) of this request.